



*George*  
JAN 09 1995

**Andrew J. Thomas, Jr.**  
Counsel-Environmental Matters

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General Electric Company  
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January 6, 1995

**William G. Little, Esq.**  
New York State Department of Environmental Conservation  
Division of Environmental Enforcement  
50 Wolf Road Rm. 400  
Albany, New York 12233-5550

**RE: Onondaga Lake -- Supplementary Response to Joint Request for Information**

Dear Mr. Little:

This letter responds to your Agency's deficiency letter dated December 8, 1994 regarding our August 25, 1994 reply to the joint request for information from EPA and NYS-DEC. While General Electric Company ("GE") is committed to making a full and complete disclosure of all responsive documentation in our possession, we are unable to submit documentation located at GE's former Syracuse Electronics Park facility. As we have previously discussed, Martin Marietta Corporation ("MMC") assumed the custody and control of all documents located at Electronics Park, pursuant to the terms of the 1993 Transaction Agreement between GE and MMC concerning the former GE Aerospace business. In an effort to bolster our original response, as well as to specifically address the concerns identified in your deficiency letter, we conducted a supplemental search of GE locations likely to have retained documentation concerning the hazardous waste management practices at the Electronics Park facility. We have also reviewed back-up documentation of two previously submitted responses to information requests from New York State and/or the U.S. EPA (the relevant sites are Frontier Chemical and Solvent Savers Lincklaen) that were located at Corporate Environmental Programs' field office in Albany, NY.

Based on our supplemental investigative efforts, we believe that we have satisfactorily addressed your concerns. Please note that the enclosed documents are responsive to questions 6-10; we have attached a brief index for your convenience.

In response to your second identified deficiency, documents relating to the Court Street and Farrell Road locations have historically been kept with the Syracuse Electronics Park documentation and, as such, are also within the custody and control of MMC.

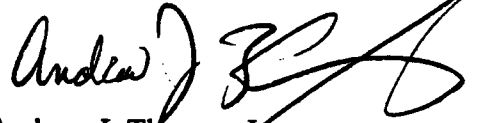
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In reference to the sources of information for question's 6-10 of the original joint request for information, please refer to attachments 2, 3 and 4 of GE's August 25, 1994 reply to the joint request, for documents relating to the East Molloy Road Service Shop. Also, as a result of our supplemental investigation, additional analytical data and correspondence relating to the East Molloy Facility are enclosed in this supplemental response. Moreover, responsive documents for questions 6-10 regarding Electronics Park, including the Court Street and Farrell Road locations, are also enclosed in this supplemental response.

This information is submitted by General Electric Company as a good faith effort to supplement our August 25, 1994 response pursuant to your December 8, 1994 deficiency letter. As such, it does not constitute an admission that GE is in any way liable or responsible for any cost or expenses which EPA, NYS-DEC, or any other party may incur in connection with activities that may have been or may be taken at the site.

Very Truly Yours,

A handwritten signature in black ink, appearing to read "Andrew J. Thomas, Jr.", with a large, stylized flourish extending from the end of the signature.

Andrew J. Thomas, Jr.

AJT/jag  
attachment  
enclosures

cc: George A. Shanahan, USEPA (w/o enclosures)

**Index to files enclosed with General Electric Company's response to NYS-DEC's  
December 8, 1994, deficiency letter:**

<b><u>FILE</u></b>	<b><u>DESCRIPTION</u></b>	<b><u>RESPONSIVE TO REQUEST #:</u></b>
1.	East Molloy Road Facility: 1992-94 Correspondence regarding waste water discharge permit and pH NOV violation.	6, 7, 10, 12
2.	Electronics Park, Court Street, and Farrell Road: 1977-78 NYS-DEC Hazardous Waste Survey 1979, 84 NYS-DEC Hazardous Waste Disposal Survey 1977, 78, 84-86 NYS-DEC Industrial Chemical Survey 1981 EPA Hazardous Waste Permit Application 1980-1982 TSD Facility Annual Reports	6-10, 12
3.	Electronics Park: SPDES Discharge Permit and Comments, 1992	10,12
4.	Electronics Park: PCB Inventory and Off-Site Disposal Records (1988-90)	6,7,8,12
5.	Electronics Park: Groundwater Investigations, Phase I, II & III (1990-92)	9,10,12